REMARKS

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, claims 1-21 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,651,058 ("*Sundaresan*"). Claims 1-3, 11-13, and 18 have been cancelled without prejudice or disclaimer of the subject matter contained therein. The remaining claims have been amended to more particularly claim the present invention, with claims 4, 6, 8, 9, 10, 14, 15, 16, 17, and 19 having also been rewritten into independent form. Because *Sundaresan* fails to disclose each element of the remaining claims, Applicants respectfully traverse the rejection of these claims.

Application Papers

Applicants thank the Examiner for the telephone conference of August 19, 2004. The Official Action of May 20, 2004 indicated that the Examiner objected to the oath or declaration in the present application. During the August 19 telephone conference, however, the Examiner explained the objection was designated in error and should be disregarded. Accordingly, the Applicants understand the declaration comports with the requirements set forth by the U.S. PTO.

Claims 4, 5, 14, 19, and 20

To properly reject a claim as anticipated under §102, each recited claim element must be found in a single prior art reference. (MPEP § 2131 (8th ed. Rev. Feb. 2003).)

Claim 4, as amended, recites, *inter alia*:

> A knowledge analysis system ... comprising:
>
> ... means for setting important words having priority in
> clustering at creation of the cluster database, and carrying

out clustering to create an axis of cluster on the basis of the
important words, and has means for storing analysis
conditions used at creation of the cluster database.

Claim 14, as amended, recites, *inter alia*:

A knowledge analysis method ... comprising:

... clustering knowledge accumulated in the knowledge
database to create a cluster database in which each
knowledge is classified into clusters defined based on a
category, where in the creation of the cluster database,
important words having priority in clustering being set to
create an axis of cluster on the basis of the important words;
and storing analysis conditions used in the creation of the
cluster database.

Claim 19, as amended, recites, *inter alia*:

A knowledge analysis program product ... comprising:

... a command to carry out analysis condition setting
procedures to set important words having priority in
clustering, ... at creation of the cluster database; and

... a command to carry out analysis condition saving
procedures to save the analysis conditions used at creation
of the cluster database.

Sundaresan, instead, discloses an automatic mining system for discovering
terms that are relevant to a given target topic from a large database of unstructured
information. (*Id.*, col. 3, lines 35-37.) According to the cited system, a significant
number of the relevant topic's instances belong to the target topic's cluster, the
significance of which is determined by a user-defined threshold. (*Id.*, col. 7, lines 40-
47.)

As shown above, claim 4 provides a knowledge system comprising "a means for
setting important words having priority in clustering at creation of the cluster database,"
and "a means for storing analysis conditions used at creation of the cluster database."
While the cited reference discloses storing the relevant terms mined by the automatic
mining system 10 in a relevant terms database 130 (*Id.*, col. 7, lines 29-31), it does not

teach "a means for storing analysis conditions used at creation of the cluster database," as recited in claim 4.

Sundaresan likewise fails to disclose "storing analysis conditions used in the creation of the cluster database," as recited in claim 14, as well as "analysis condition saving procedures to save the analysis conditions used at creation of the cluster database," as recited in claim 19.

Absent such disclosures, *Sundaresan* cannot anticipate claims 4, 14, or 19, and the claims should be allowed over the reference. Applicants also submit that dependent claims 5 and 20 should be allowable at least because of their respective dependence from allowable claims 4 and 19. For all these reasons, Applicants respectfully request withdrawal of the rejection of these claims.

Claims 6, 7, and 15

Claim 6, as amended, recites, *inter alia*:

> A knowledge analysis system ... comprising:
>
> ... re-analysis means for obtaining the analysis conditions, and carrying out clustering once again by use of the analysis conditions in which at least one of a set of the important words, a set of the unnecessary words and a set of the synonymous words are reset to recreate the cluster database and to replace the already-created cluster database.

Claim 15, as amended, recites, *inter alia*:

> A knowledge analysis method ... comprising:
>
> ... obtaining the analysis conditions, and carrying out clustering once again by use of the analysis conditions in which at least one of a set of the important words, a set of the unnecessary words and a set of the synonymous words are reset to recreate the cluster database and to replace the already-created cluster database.

In contrast, *Sundaresan* discloses a synonyms check unit to identify the synonyms of a relation (*id.*, col. 8, lines 22-62), and a relevant terms discoverer 110 to compensate for the presence of false association among the candidate terms and the target topic (*id.*, col. 9, lines 58-64). This is not the same, and indeed the cited reference does not teach or suggest "carrying out clustering once again" using "the analysis conditions in which at least one of a set of the important words, a set of the unnecessary words and a set of the synonymous words are reset" in order to "recreate the cluster database" and "replace the already-created cluster database" as recited by both claims 6 and 15.

Accordingly, Applicants respectfully submit that *Sundaresan* does not anticipate claims 6 or 15, and the claims should be allowed over the reference. Applicants also respectfully request the allowance of dependent claim 7, which should be allowable at least because of its dependence from allowable claim 6.

Claims 8 and 16

Claim 8, as amended, recites, *inter alia*:

> A knowledge analysis system ... comprising:
>
> ... the knowledge analysis means determines a hierarchical structure defining hierarchical relation of one knowledge and another knowledge, and also determines clusters to which the one knowledge and the another knowledge belong.

Claim 16, as amended, recites, *inter alia*:

> A knowledge analysis method ... comprising:
>
> ... a hierarchical structure defining hierarchical relation of one knowledge and another knowledge is determined, and clusters to which the one knowledge and the another knowledge belong are determined.

Sundaresan, instead, discloses a system for the automatic construction of generalization-specialization hierarchy of terms that builds a relevance model based

upon a generalization-specialization hierarchy. (*Id.*, col. 9, line 65 - col. 10, line 20.) More specifically, the cited reference teaches determining a generalization relation between <u>terms</u>, *e.g.*, a new candidate term and a term in the relevance model, as well as a specialization relation of relevant terms. (*Id.*) But "a hierarchical structure defining hierarchical relation of one knowledge and another knowledge" is neither taught nor suggested by the cited reference.

Absent such disclosures, *Sundaresan* cannot anticipate claims 8 or 16, and the claims should thus be allowed over the reference. For these reasons, withdrawal of the rejection of these claims is respectfully requested.

Claim 9

Claim 9, as amended, recites, *inter alia*:

> A knowledge analysis system ... comprising:
>
> ... the knowledge analysis means prompts a user to input clustering conditions including at least one of an analysis result name, an analysis objective period, a focusing keyword, a number of focused cases, a number of hierarchies of hierarchical structure defining hierarchical relation of one knowledge and another knowledge, a presence or absence of redundancy of knowledge, and a number of most significant clusters to carry out clustering on the basis of the input clustering conditions.

In contrast, *Sundaresan* discloses a system where a significant number of the relevant topic's instances belong to the target topic's cluster, the significance of which is determined by a user-defined threshold (*Id.*, col. 7, lines 40-47.) *Sundaresan*, however, does not disclose or suggest the claimed "knowledge analysis means" for <u>prompting</u> a user to input clustering conditions as recited in claim 9.

Moreover, as explained with respect to claims 8 and 16, *Sundaresan* also fails to teach "a hierarchical structure defining hierarchical relation of one knowledge and another knowledge," also recited by claim 9.

For at least these reasons, Applicants submit that claim 9 is allowable over *Sundaresan*, and respectfully request withdrawal of the rejection of this claim.

Claims 10 and 17

Claim 10, as amended, recites, *inter alia*:

> A knowledge analysis system ... comprising:
>
> ... editing processing means for editing the already-created cluster database and making the client terminal display an edited cluster database, and
>
> the editing processing means prompts the client terminal to input editing conditions including a presence or absence of at least one of a cluster list display, a time series display, a hierarchical structure display, and a graph display, and edits the cluster database on the basis of the editing conditions input by the client terminal, and makes the client terminal display an editing processing result including at least one of the cluster list display, the time series display, the hierarchical structure display, and the graph display.

Claim 17, as amended, recites, *inter alia*:

> A knowledge analysis method ... comprising:
>
> ... prompting the client terminal to input editing conditions including a presence or absence of at least one of a cluster list display, a time series display, a hierarchical structure display, and a graph display; and
>
> editing the already-created cluster database on the basis of the editing conditions input by the client terminal to make the client terminal display an editing processing result including at least one of the cluster list display, the time series display, the hierarchical structure display, and the graph display.

Sundaresan, instead, discloses a term database 80 containing sets of relations that have been identified by a relation identifier 150 as well as sets of patterns that have already been identified by a pattern identifier 160. (*Id.*, col. 8, lines 8-17.) However, the cited reference does not teach or suggest "editing the already-created cluster

database." Furthermore, the cited reference also fails to teach or suggest "prompting" the client terminal to input editing conditions including "a presence or absence of at least one of a cluster list display, a time series display, a hierarchical structure display, and a graph display," editing the cluster database "on the basis of the editing conditions input by the client terminal," and making "the client terminal display an editing processing result including at least one of the cluster list display, the time series display, the hierarchical structure display, and the graph display."

For at least these reasons, *Sundaresan* does not disclose each element recited in claims 10 and 17, and consequently does not anticipate those claims. Applicants request the withdrawal of the rejection of these claims.
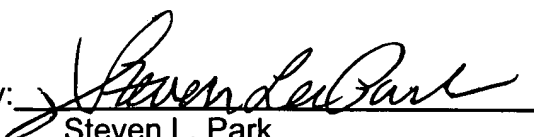
CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: August 20, 2004

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